

NAME	SECTION TO STRIKE	REASON GIVEN BY CLECS	RESPONSE OF AMERITECH ILLINOIS
Aron	4:20 - 5:6	Duplicative Below (Lube); Duplicative Rehearing; Within possession at time of hearing.	Foundation evidence for opinion that unbundling Project Pronto will increase Ameritech Illinois' costs (which responds to Commissioner Squires' Question No. 9, requesting support for Ameritech Illinois claim of increased costs) for discussing the economic issues surrounding alternatives to unbundling Project Pronto (which responds directly to Commissioner Squires' Question 1 on application of the impair standard), and for opinion that such unbundling will adversely effect competition (which responds to Commissioner Squires' Question No. 2, requesting "comment on the appropriateness of the NGDLC UNEs that were previously defined"). Also foundation evidence for identifying nature of relevant market, which is relevant to application of the "necessary and impair" test and determining the propriety of the Order's Project Pronto "unbundling" and "collocation" requirements. See Order Granting Rehearing of Issue Nos. II and III of Ameritech Illinois' Application for Rehearing.
	6:8 - 7:15	Within possession at time of hearing; Relevance.	See above.
	7:16 - 22:1	Within possession at time of hearing; Scope; Relevance.	See above.
	23:7 - 34:10	Within possession at time of hearing; Scope; Relevance.	See above.

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	34:11-19	Unsupported speculation.	Not a proper ground for moving to strike. Direct response to Commissioner Squires' Question No. 9, requesting support for Ameritech Illinois' claim that unbundling Project Pronto would substantially increase costs, and Question No. 2, requesting "comment on the appropriateness of the NGDLC UNEs that were previously defined." Foundation evidence for opinion that unbundling Project Pronto is technically unsound, inefficient, and economically infeasible, which directly responds to issues on rehearing. See Order Granting Rehearing on Issue II of Ameritech Illinois' Application for Rehearing.
	34:20-23	Duplicative rehearing.	See above.
	34:23 - 35:11	Unsupported speculation.	Not a proper ground for moving to strike. Direct response to Commissioner Squires' Question No. 9, requesting support for Ameritech Illinois' claim that unbundling Project Pronto would substantially increase costs, and Question No. 2, requesting "comment on the appropriateness of the NGDLC UNEs that were previously defined." Foundation evidence for opinion that unbundling Project Pronto is technically unsound, inefficient, and economically infeasible, which directly relates to issues on rehearing. See Order Granting Rehearing on Issue II ("The Order's Project Pronto Requirement is Technically Unsound, Inefficient, and Largely Infeasible") of Ameritech Illinois' Application for Rehearing.

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	35:12-22	Unsupported speculation; Within possession at time of hearing; Scope; Relevance.	See above. Also directly relates to application of "necessary and impair" test, which is a necessary part of any determination under Rehearing Issue II and provides evidence which is specifically called for by Questions 1 and 2 of Commissioner Squires' questions.
	36:1-7	Duplicative below (Lube Direct, Reply); Within possession at time of hearing.	See above.
	36:8-13	Scope; Relevance; Within possession at time of hearing.	See above.
	36:14 - 37:13	Duplicative Below (Lube); Within possession at time of hearing.	See above.
	37:14 - 37:23	Unsupported speculation; Within possession at time of hearing; Scope; Relevance.	See above.
	38: 1-4	Scope.	See above.
	38:5-13	Unsupported speculation; Scope; Within possession at time of hearing.	See above.
	39:7-21	Unsupported speculation; Within possession at time of hearing.	See above.

NAME	SECTION TO STRIKE	REASON GIVEN BY CLECS	RESPONSE OF AMERITECH ILLINOIS
	39:26 - 40:2	Scope; Relevance; Within possession at time of hearing.	See above. Direct response to Commissioner Squires' Question No. 9, requesting support for Ameritech Illinois' claim that unbundling Project Pronto would substantially increase costs, Question No. 1, regarding application of the impair standard, in that it goes to defining the relevant market for an impair analysis, and Question No. 2, requesting "comment on the appropriateness of the NGDLC UNEs that were previously defined." Foundation evidence for opinion that unbundling Project Pronto is technically unsound, inefficient, and economically infeasible, which is proper testimony on rehearing. See Order Granting Rehearing on Issue II of Ameritech Illinois' Application for Rehearing.
Aron	41:1 - 42:2	Scope; Relevance; Within possession at time of hearing.	See above.
	42:3-13	Unsupported speculation.	See above.
Boyer	4:12-29; 5-12; 13:1-19	Within possession at time of hearing; Duplicative below (Lube Direct, Rebuttal, Surrebuttal).	Foundation evidence for responses to Commissioner Squires' Question Nos. 1, 2, 3, 6 and 8. Directly addresses facts relevant to the impair test. See Order Granting Rehearing on Issue II in Ameritech Illinois' Application for Rehearing.
	13:21-29; 14-18; 19:1-13	Within possession at time of hearing; Duplicative below (Lube Direct, Rebuttal, Surrebuttal; Chapman Rebuttal).	See above.

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	19:15-30; 20-31; 32:1-19	Within possession at time of hearing; Duplicative below (Lube Direct, Rebuttal, Surrebuttal).	Direct response to Commissioner Squires' Question No. 1, requesting comment on the "impair" standard and "the availability of alternatives to unbundling Project Pronto," Question No. 2, requesting "comment on the appropriateness of the NGDLC UNEs that were previously defined," and Question No. 3, requesting "a detailed analysis on the 4 criteria for unbundling packet switching." Also applicable to the grant of rehearing on Issues II and VI of Ameritech Illinois' Application for Rehearing, regarding the impair test and technical feasibility of the Order's requirements.
	32:21-25; 33-43; 44:1-23	Within possession at time of hearing; Duplicative below (Lube Direct, Rebuttal, Surrebuttal).	Direct response to Commissioner Squires' Question No. 1 regarding the impair test, Question No. 2, requesting "comment on the appropriateness of the NGDLC UNEs that were previously defined," and Question No. 6 regarding line card collocation. This is proper testimony on rehearing. Also relevant to the grant of rehearing on Issues II (impair test), III (line card collocation) and VI (practicality/feasibility issues) of Ameritech Illinois' Application for Rehearing.
	44:25-31; 45-49	Within possession at time of hearing; Duplicative below (Lube Direct, Rebuttal, Surrebuttal).	Foundation evidence for opinion that line cards do not meet the standards for collocation, which is proper testimony on rehearing. See Order Granting Rehearing of Issue No. III ("Line Cards Do Not Meet the Legal Standards for Collocation") of Ameritech Illinois' Application for Rehearing. Responsive to Commissioner Squires' Questions 6 and 7 regarding line card collocation.

NAME	SECTION TO STRIKE	REASON GIVEN BY CLECS	RESPONSE OF AMERITECH ILLINOIS
	54:16-21	Relevance; Scope.	Direct response to Commissioner Squires' Question No. 1.C, requesting "comment on each of the factors listed in Section 51.317(b)(3)." Relevant to grant of rehearing on Issue II and the impair test.
	All Attachments; CJB-1;2;3;4;5;6;7;8	Within possession at time of hearing; Duplicative below (Lube Direct, Rebuttal, Surrebuttal).	Foundation evidence for responses to Commissioner Squires' Question Nos. 1, 2, 3, 6 and 8. Relevant to grant of rehearing on Issues II (impair test), III (line card collocation), and VI (practicality/feasibility issues).
Cass	2-3, Schedule CFC-3 B126	Scope; Within possession at the time of the hearing.	Foundation evidence for Ameritech Illinois' proposed OSS modification charge, which is proper testimony on rehearing. <i>See</i> Order Granting Rehearing of Issue No. 14 ("The Commission's \$0 Recurring OSS Modification Charge is Unlawful") of Ameritech Illinois' Application for Rehearing. The charge is being calculated on an average basis, rather than a per minute basis as previously proposed.
	2; 3:1-12; 4:13-22; 5-8; Schedule CFC 2	Ameritech agreed to address these issues in a later proceeding (Smallwood Rebuttal at 17:18-18:15).	Direct response to Commissioner Squires' Question No. 12, requesting "cost studies and all supporting documentation and assumptions" for the Broadband Service.
	1	Stricken because all substantive testimony stricken.	See previous two entries.

NAME	SECTION TO STRIKE	REASON GIVEN BY CLECS	RESPONSE OF AMERITECH ILLINOIS
Crandall	3:1-3	Legal conclusion.	Foundation evidence for opinion that the Commission should not order the unbundling of Project Pronto, which is a subject of Commissioner Squires' Question No. 1 (relating to the "impair" standard and the Section 317(b) factors) and Question No. 2 (requesting "comment on the appropriateness of the NGDLC UNEs that were previously defined"). This is proper testimony on rehearing. See Order Granting Rehearing of Issue No. II ("The Order's 'Unbundling' Requirements Violate Federal Law") of Ameritech Illinois' Application for Rehearing.
	3:4-6	Scope; Relevance; Within possession at time of hearing.	See above.
	3:10-14	Scope; Relevance; Within possession at time of hearing.	See above.
	3:15-17	Legal conclusion.	See above.
	3:23 - 5:9	Duplicative rehearing; Duplicative below	See above.
Crandall	6:5 - 10:6	Scope; Relevance; Within possession at time of hearing.	Foundation evidence for opinion that the Commission should not order the unbundling of Project Pronto, which is a subject of Commissioner Squires' Question No. 1 (relating to the "impair" standard and the Section 317(b) factors) and Question No. 2 (requesting "comment on the appropriateness of the NGDLC UNEs that were previously defined"). This is proper testimony on rehearing. See Order Granting Rehearing of Issue No. II ("The Order's 'Unbundling' Requirements Violate Federal Law") of Ameritech Illinois' Application for Rehearing.
	10:7-19	Unsupported speculation.	See above. Not a proper ground for moving to strike.

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	10:21 - 11:3	Relevance; Within possession at time of hearing; Legal conclusion.	See above.
	11:22-25	Legal conclusion.	See above.
	11:25-27	Unsupported speculation.	See above.
	12:3-24	Legal conclusion; Within possession at time of hearing.	See above.
	13:1 - 14:8	Unsupported speculation; Relevance; Within possession at time of hearing.	See above.
	14:9-14	Relevance; Within possession at time of hearing.	See above.
	14:15 - 15:14	Scope; Relevance; Within possession at time of hearing.	See above.
	15:15-26	Relevance; Scope.	See above.
	16:1 - 18:21	Relevance; Scope.	See above.
	19:1 - 21:19	Relevance; Scope; Within possession at time of hearing.	See above.
	23:1-17	Unsupported speculation; Within possession at time of hearing.	See above. Direct response to Commissioner Squires' Question No. 1, requesting analysis of the Section 317(b)(2) and (b)(3) factors. Relevant to grant of rehearing on Issue II and the impair test.
	23:20 - 24:15	Relevance; Scope.	See above.
	24:2 - 24:5	Unsupported speculation.	See above. Direct response to Commissioner Squires' Question No. 1, requesting analysis of the Section 317(b)(2) and (b)(3) factors. Relevant to grant of rehearing on Issues II and III.



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Hamilton	3:12-22	Duplicative Below (Lube Rebuttal at 26).	Foundation evidence for opinion concerning the operational difficulties surrounding line card "collocation," which is proper testimony on rehearing. <i>See</i> Order Granting Rehearing of Issue No. 6, in particular 6.C ("Adverse Impact on Provisioning, Maintenance, and Repair") of Ameritech Illinois' Application for Rehearing. Response to Commissioner Squires' Question No. 9, requesting support for Ameritech Illinois' claim of increased costs. Also relevant to the impair analysis required by Commissioner Squires' Question No. 1 and the grant of rehearing on Issue II.
	4:2-4	Scope (not in Application for Rehearing).	See above
	4:7 - 5:3	Within possession at time of hearing.	See above.
	4:11-13	Scope (not in Application for Rehearing).	See above.
	4:22-5:3	Legal conclusion.	See above.
	5:4 - 6:3	Within possession at time of hearing.	See above.
	5:13 - 6:3	Scope (not in Application for Rehearing).	See above.
	6:4-10	Unsupported Speculation; Within possession at time of hearing; Scope (not in Application for Rehearing).	See above.
	6:15 - 7:7	Unsupported speculation; Within possession at time of hearing; Scope (not in Application for Rehearing).	See above.
	7:9-8:2	Within possession at time of hearing; Scope (not in Application for Rehearing).	See above.
	8:4-20	Scope (not in Application for Rehearing); Within possession at time of hearing; Relevance.	See above.

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	9:1-21	Within possession at time of hearing; Scope (not in Application for Rehearing).	Foundation evidence for opinion concerning the operational difficulties surrounding line card "collocation," which is proper testimony on rehearing. See Order Granting Rehearing of Issue Nos. III and VI of Ameritech Illinois' Application for Rehearing. Response to Commissioner Squires' Question No. 9, requesting support for Ameritech Illinois' claim of increased costs. Increased costs are also relevant to the impair analysis required by Commissioner Squires' Question No. 1 and the grant of rehearing on Issue II.
	10:1-4	Within possession at time of hearing; Scope.	See above.
	10:8-15	Within possession at time of hearing; Scope (not in Application for Rehearing).	See above.
	10:16 - 11:2	Scope; Unsupported speculation; Within possession at time of hearing.	See above.
	11:3-17	Scope; Within possession at time of hearing.	See above.
	11:19-12:13	Scope; Within possession at time of hearing.	See above.
	12:7-12	Unsupported speculation.	See above.
	12:14-13:7	Scope (not in Application or hearing); Within possession at time of hearing.	See above.
	13:8-20	Scope; Relevance; Within possession at time of hearing.	See above.
	14:9-21	Scope; Within possession at time of hearing; Relevance.	See above.
	15:1-13	Within possession at time of hearing.	See above.
	15:19-20	Scope; Within possession at time of hearing; Relevance.	See above.
	15:21-16:8	Scope; Within possession at time hearing.	See above.

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	16:14 - 17:7	Scope; Within possession at time of hearing; Unsupported speculation.	See above.
	17:8-20	Scope; Within possession at time of hearing.	Foundation evidence for opinion concerning the operational difficulties surrounding line card "collocation," which is proper testimony on Rehearing. See Order Granting Rehearing of Issue Nos. III and VI of Ameritech Illinois' Application for Rehearing. Response to Commissioner Squires' Question No. 9, requesting support for Ameritech Illinois' claim of increased costs. Also relevant to the impair analysis required by Commissioner Squires' Question No. 1 and the grant of rehearing on Issue II.
	17:21-18:15	Scope; Within possession at time of hearing.	See above.
	18:5-8	Unsupported speculation	See above.
	19:12 - 20:10	Scope; Unsupported speculation; Within possession at time of hearing.	See above.
Ireland	2:23-3:35	Within possession at the time of hearing; Relevance; Scope.	Foundation evidence for opinion that the Commission should not order the unbundling of Project Pronto or collocation of line cards, which is a subject of Commissioner Squires' Question No. 1 (relating to the "impair" standard), Question No. 2 (requesting "comment on the appropriateness of the NGDLC UNEs that were previously defined") and Question No. 9, regarding increased costs and economic infeasibility. This is proper testimony on rehearing. See Order Granting Rehearing of Issue Nos. II, III and VI of Ameritech Illinois' Application for Rehearing.

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	3:37-44	Within possession at the time of hearing.	See above.
	4:1-7	Within possession at the time of hearing.	See above.
	4:14-20; 7:11-16; 8:15-23	Within possession at the time of hearing; Relevance; Scope.	See above.
	9	Relevance; Scope.	See above.
	10:8-18:4	Within possession at the time of hearing; Relevance; Scope.	Foundation evidence for opinion that the Commission should not order the unbundling of Project Pronto or collocation of line cards, which is a subject of Commissioner Squires' Question No. 1 (relating to the "impair" standard), Question No. 2 (requesting "comment on the appropriateness of the NGDLC UNEs that were previously defined") and Question 9, regarding economic infeasibility. This is proper testimony on rehearing. See Order Granting Rehearing of Issue Nos. II, III and VI of Ameritech Illinois' Application for Rehearing.
	18:6-19:17	Within possession at the time of hearing.	See above.
	20:8-21; 21:5-22:22; 23:10-19	Within possession at the time of hearing; Relevance; Scope.	See above.
	23:1-9	Within possession at the time of hearing; Relevance; Scope; Hearsay.	See above. Response to Commissioner Squires' Question No. 1, requesting analysis of the Section 317(b)(2) and (b)(3) factors, and Question No. 9, regarding economic infeasibility, as well as the grant of rehearing on Issue No. 2.

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	24:12-21	Scope.	See above.
	25:5-17	Within possession at the time of hearing; Relevance; Scope.	Foundation evidence for opinion that the Commission should not order the unbundling of Project Pronto or collocation of line cards, which is a subject of Commissioner Squires' Question No. 1 (relating to the "impair" standard), Question No. 2 (requesting "comment on the appropriateness of the NGDLC UNEs that were previously defined"), and Question No. 9, regarding economic infeasibility. This is proper testimony on rehearing. <i>See</i> Order Granting Rehearing of Issue No. II of Ameritech Illinois' Application for Rehearing.
	25:19-27	Within possession at the time of hearing; Relevance.	See above.
	26:1-11	Within possession at the time of hearing; Relevance Duplicative below (Lube, Chapman).	See above.
	26:12-25	Within possession at the time of hearing; Relevance.	See above. Response to Commissioner Squires' Question No. 1, requesting analysis of the Section 317(b)(2) and (b)(3) factors, and the grant of rehearing on Issue II.
	27:1-16	Within possession at the time of hearing; Relevance; Scope.	See above.
	27:18-27; 29:1-12	Within possession at the time of hearing; Duplicative below (Lube).	Foundation evidence for opinion that the Commission's Project Pronto requirement is technically unsound, which is proper testimony on rehearing. <i>See</i> Order Granting Rehearing of Issue No. VI. Also relevant to Commissioner Squires' Questions 7 (regarding line card compatibility) and 8 (regarding technically feasible points of interconnection).

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	28	Duplicative below (Lube); Duplicative rehearing	See above.
	30-31:8	Duplicate below (Lube); Scope; Within possession at the time of the hearing.	Direct response to Commissioner Squires' Question No. 1.A, requesting comment on the availability of alternatives to unbundling Project Pronto NGDLC, "including, but not necessarily limited to, self-provisioning" and "including a discussion of the factors found in Section 51.317(b)(2)(i) through (v)." Also relevant to grant of rehearing on Issue II (impair test).
	31:10-21; 33:18-34:7	Within possession at the time of hearing; Relevance; Scope.	See above. Foundation evidence for opinion that the Commission should not order the unbundling of Project Pronto or collocation of line cards, which is a subject of Commissioner Squires' Question No. 1 (relating to the "impair" standard), Question No. 2 (requesting "comment on the appropriateness of the NGDLC UNEs that were previously defined"), and Question No. 9, regarding economic infeasibility. This is proper testimony on rehearing. <i>See</i> Order Granting Rehearing of Issue No. II of Ameritech Illinois' Application for Rehearing.
	32:3-6	Legal conclusion	Direct response to Commissioner Squires' Question No. 2, requesting "comment on the appropriateness of the NGDLC UNEs that were previously defined."
Keown	3:12-25; 4-9	Within possession at the time of hearing; Duplicative below (Lube Direct 3-5; Rebuttal 1-3, 11-13, 21-23, 30-33).	Foundation evidence for responses to Commissioner Squires' Question Nos. 2, 3, 9, 10 and 11. Foundation for later discussion of technical issues directly raised in Mr. Keown's affidavit in support of rehearing, which relates to the grant of rehearing on Issue VI (practicality/feasibility issues).

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	Attachments JEK-1;2;3	Within possession at the time of hearing; Duplicative below (Lube Direct 3-5; Rebuttal 1-3, 11-13, 21-23, 30-33).	See above.
	11:5-35; 12-13; 14:1-18; Attachment JEK-4	Within possession at the time of hearing.	Direct response to Commissioner Squires' Question No. 2, requesting "comment on the appropriateness of the NGDLC UNEs that were previously defined," and Question No. 9, requesting support for Ameritech Illinois' claim that the Project Pronto requirement would increase its costs. Foundation evidence for opinion that the Order's Project Pronto requirement is technically unsound, inefficient and infeasible, which is proper testimony on rehearing. <i>See</i> Order Granting Rehearing of Issue No. VI ("The Order's Project Pronto Requirement is Technically Unsound, Inefficient, and largely Infeasible") of Ameritech Illinois' Application for Rehearing. Relates to the exact same issues discussed in Mr. Keown's affidavit in support of rehearing.
	14:20-27; 15-16; 17:1-10	Within possession at the time of hearing; Duplicative below (Lube Rebuttal 24-25).	See above. Responsive to Commissioner Squires' Question No. 10, relating to premature exhaust of the NGDLC, and Question No. 9, requesting support for Ameritech Illinois' claim of increased costs. Relates to the exact same issues discussed in Mr. Keown's affidavit in support of rehearing.
	18:5-24	Within possession at the time of hearing.	Direct response to Commissioner Squires' Question No. 9.B, asking whether Ameritech Illinois' claims of increased costs would be valid absent a virtual collocation requirement for line cards.
	2:23-25; 3:1-8	Within possession at the time of hearing; Duplicative below (Lube 24-25).	<i>See</i> five previous responses.

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Levin	4:10-22	Relevance; Scope; and Within possession at time of hearing.	Direct response to Commissioner Squires' Question No. 1, relating to the "impair" standard, and Question No. 2, requesting "comment on the appropriateness of the NGDLC UNEs that were previously defined," by defining the relevant market to be examined and pertinent policy considerations. Foundation evidence for opinion that the Commission should not order the unbundling of Project Pronto, which is proper testimony on rehearing. <i>See</i> Order Granting Rehearing of Issue No. II ("The Order's 'Unbundling' Requirements Violate Federal Law") of Ameritech Illinois' Application for Rehearing.
	5:1 - 7:2	Scope; Within possession at time of hearing.	See above.
	7:3 - 12:5	Relevance; Scope; and Within possession at time of hearing.	See above.
	12:6-19	Relevance.	See above.
	12:20-24	Within possession at the time of hearing.	See above.
	12:24-27	Legal conclusion.	See above.
	13:1-28	Legal conclusion; Relevance; Within possession at the time of hearing.	See above.



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	14:1-17	Unsupported speculation; Within possession at time of hearing.	Direct response to Commissioner Squires' Question No. 9, requesting support for Ameritech Illinois' claim that unbundling Project Pronto would substantially increase costs, and Question Nos. 1 and 2, regarding the impair analysis and propriety of unbundling. Foundation evidence for opinion that unbundling Project Pronto is economically unsound, which is proper testimony on rehearing and directly relevant to the impair analysis under the FCC's Rule 317(b). <i>See</i> Order Granting Rehearing of Issue II of Ameritech Illinois' Application for Rehearing.
	14;18 - 15:1	Scope; Within possession at time of hearing.	See above.
	15:16-20	Scope; Relevance; Within possession at time of hearing.	Direct response to Commissioner Squires' Question No. 9, requesting support for Ameritech Illinois' claim that unbundling Project Pronto would substantially increase costs, as well as Question Nos. 1 and 2. Foundation evidence for opinion that unbundling Project Pronto is economically unsound, which is proper testimony on rehearing and relevant to the required impair analysis. <i>See</i> Order Granting Rehearing of Issue II of Ameritech Illinois' Application for Rehearing.
	15: 21-27	Scope; Relevance; Within possession at time of hearing; Unsupported speculation; Duplicative rehearing.	See above.
	16:1-11	Scope; Relevance; Within possession at time of hearing; Unsupported speculation.	See above.
	16:12-29	Scope; Relevance; Within possession at time of hearing.	See above.
	16:16-17	Unsupported speculation.	See above.

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	17:1 - 18:11	Scope; Relevance; Within possession at time of hearing.	Direct response to Commissioner Squires' Question No. 1, relating to the "impair" standard, and Question No. 2, requesting "comment on the appropriateness of the NGDLC UNEs that were previously defined." Foundation evidence for opinion that the Commission should not order the unbundling of Project Pronto, which is proper testimony on rehearing and is directly related to the required impair analysis. <i>See</i> Order Granting Rehearing of Issue No. II ("The Order's 'Unbundling' Requirements Violate Federal Law") of Ameritech Illinois' Application for Rehearing.
	18:12-21	Relevance.	See above.
	19:1-12	Scope; Relevance; Within possession at time of hearing.	See above.
Mears	1-9, Schedules CM-1; CM-2	Ameritech agreed to address these issues in a later proceeding (Smallwood Rebuttal at 17:18-18:15).	Direct response to Commissioner Squires' Question No. 12, requesting "cost studies and all supporting documentation and assumptions" for the Broadband Service.
Mitchell	3: 4- 4: 6	Duplicative below; Within possession at time of hearing.	Foundation evidence for opinion concerning direct access to back office systems, which is proper testimony on rehearing. <i>See</i> Order Granting Rehearing of Issue No. 9 ("The Commission's Decision Allowing CLECs Direct Access to Ameritech Illinois' Back Office Systems Has No Factual or Legal Basis") of Ameritech Illinois' Application for Rehearing. Foundation evidence for Response to Commissioner Squires' Question No. 15, relating to direct access to back office systems.
	4: 7-15	Scope; Within possession at time of hearing.	See above.

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	5: 1-11	Duplicative below (Jacobson Rebuttal at 8-9); Within possession at time of hearing.	See above.
	5: 12- 6: 5	Scope; Relevance; Within possession at time of hearing.	See above.
	7: 14-21	Duplicative below (Jacobson Rebuttal at 14-15); Within possession at time of hearing.	Foundation for response to Commissioner Squires' Question No. 15, requesting a description of the similarities and differences between providing direct access to back office systems as opposed to EDI or GUI access.
	8: 5-9	Legal conclusion; Within possession at time of hearing.	See above.
	8: 19-23	Duplicative below (Jacobson Rebuttal at 21); Relevance; Within possession at time of hearing.	See above.
	9: 10-13	Duplicative below (Jacobson Rebuttal at 14-15); Within possession at time of hearing.	See above.
	9: 15- 10: 2	Cross referenced in stricken testimony of another witness.	Direct response to Commissioner Squires' Question No. 15, requesting a description of the similarities and differences between providing direct access to back office systems as opposed to EDI or GUI access.
	10: 4-12	Within possession at time of hearing; Duplicative below (Jacobson Rebuttal at 30-32).	See above.
	10: 20- 11: 5	Within possession at time of hearing; Duplicative below (Jacobson Rebuttal at 14-15).	See above.
	11: 6-19	Relevance; Scope; Within possession at time of hearing; Duplicative below (Jacobson Rebuttal at 16- 17).	Direct response to Commissioner Squires' Question No. 15, requesting a description of the similarities and differences between providing direct access to back office systems as opposed to EDI or GUI access.
	11: 20- 13: 7	Relevance; Scope; Within possession at time of hearing.	See above.

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	13: 11-14	Legal conclusion.	See above.
	13: 15- 14: 2	Duplicative below (Jacobson Rebuttal at 16-17); Within possession at time of hearing;	Direct response to Commissioner Squires' Question No. 15, requesting a description of the similarities and differences between providing direct access to back office systems as opposed to EDI or GUI access.
	14: 26-28	Duplicative below (Jacobson Rebuttal at 30-31); Within possession at time of hearing.	Direct response to Commissioner Squires' Question No. 15, requesting a list of "all systems/interfaces included within Ameritech Illinois' OSS system," and the information available through those systems. Foundation evidence for opinion that gateway access is superior to direct access to back office systems, which is proper testimony on rehearing. <i>See</i> Order Granting Rehearing of Issue No. IX ("The Commission's Decision Allowing CLECs Direct Access to Ameritech Illinois' Back Office Systems Has No Factual or Legal Basis") of Ameritech Illinois' Application for Rehearing.

NAME	SECTION TO STRIKE	REASON GIVEN BY CLECS	RESPONSE OF AMERITECH ILLINOIS
	14: 30- 15: 1	Scope; Within possession at time of hearing.	Direct response to Commissioner Squires' Question No. 15, requesting a list of "all systems/interfaces included within Ameritech Illinois' OSS system," and the information available through those systems. Foundation evidence for opinion that gateway access is superior to direct access to back office systems, which is proper testimony on rehearing. See Order Granting Rehearing of Issue No. IX ("The Commission's Decision Allowing CLECs Direct Access to Ameritech Illinois' Back Office Systems Has No Factual or Legal Basis") of Ameritech Illinois' Application for Rehearing.
	18: 14-18	Relevance; Scope; Duplicative below (Jacobson Rebuttal at 10).	Foundation evidence for opinion that gateway access is superior to direct access to back office systems, and that gateway access provides CLECs all OSS-related information, which is proper testimony on rehearing. See Order Granting Rehearing of Issue No. IX ("The Commission's Decision Allowing CLECs Direct Access to Ameritech Illinois' Back Office Systems Has No Factual or Legal Basis") of Ameritech Illinois' Application for Rehearing.

NAME	SECTION TO STRIKE	REASON GIVEN BY CLECS	RESPONSE OF AMERITECH ILLINOIS
	21: 9- 22: 4	Relevance; Scope.	Direct response to Commissioner Squires' Question No. 15, requesting a list of "all systems/interfaces included within Ameritech Illinois' OSS system," and the information available through those systems. Foundation evidence for opinion that gateway access is superior to direct access to back office systems, and that CLECs receive the same access to OSS-related information as Ameritech Illinois, which is proper testimony on rehearing. See Order Granting Rehearing of Issue No. IX ("The Commission's Decision Allowing CLECs Direct Access to Ameritech Illinois' Back Office Systems Has No Factual or Legal Basis") of Ameritech Illinois' Application for Rehearing.
	26:18-23; 27:10-28:24	Duplicative Below (Jacobson Rebuttal at 8); Within possession at the time of the hearing.	Direct response to Commissioner Squires' Question No. 15, requesting a list of "all systems/interfaces included within Ameritech Illinois' OSS system," and the information available through those systems. Foundation evidence for opinion that gateway access provides all relevant information to CLECs, which is proper testimony on rehearing. See Order Granting Rehearing of Issue No. IX.

NAME	SECTION TO STRIKE	REASON GIVEN BY CLECS	RESPONSE OF AMERITECH ILLINOIS
	37:1-3; 38:13-39:7	Relevance; Within possession at time of hearing.	Direct response to Commissioner Squires' Question No. 15, requesting a list of "all systems/interfaces included within Ameritech Illinois' OSS system," and the information available through those systems. Foundation evidence for opinion that gateway access is superior to direct access to back office systems, and that CLECs receive the same access to OSS-related information as Ameritech Illinois, which is proper testimony on rehearing. See Order Granting Rehearing of Issue No. IX.
	43:4-1	Legal conclusion; Within possession at the time of the hearing.	Direct response to Commissioner Squires' Question No. 15, requesting a list of "all systems/interfaces included within Ameritech Illinois' OSS system," and the information available through those systems. Foundation evidence for opinion that CLECs receive the same access to OSS-related information as Ameritech Illinois, which is proper testimony on rehearing. See Order Granting Rehearing of Issue No. IX.
	43:9-10	Relevance; Within possession at the time of the hearing.	Direct response to Commissioner Squires' Question No. 15, requesting a list of "all systems/interfaces included within Ameritech Illinois' OSS system," and the information available through those systems.
	44:1-5	Scope.	Foundation evidence for opinion that gateway access is superior to direct access to back office systems.

NAME	SECTION TO STRIKE	REASON GIVEN BY CLECS	RESPONSE OF AMERITECH ILLINOIS
	46:1-17	Relevance; Within possession at the time of the hearing.	Direct response to Commissioner Squires' Question No 15, requesting a description of the similarities and differences between providing direct access to back office systems as opposed to EDI or GUI access, and requesting a recitation of what information is needed via direct access and why. Foundation evidence for opinion that there is no OSS-related information that CLECs can obtain via direct access that they are not already receiving via Ameritech Illinois' gateways, which is proper testimony on rehearing. See Order Granting Rehearing of Issue No. IX.
	47:1-21; 48:1-11	Duplicative Rehearing; Duplicative below (Jacobson at 21); Within possession at the time of the hearing.	Direct response to Commissioner Squires' Question No 15.B, requesting a description of the similarities and differences between providing direct access to back office systems as opposed to EDI or GUI access.
	48:13-23	Duplicative Below (Jacobson Rebuttal at 14:16-19); Within possession at the time of the hearing.	Direct response to Commissioner Squires' Question No 15.B, requesting a description of the similarities and differences between providing direct access to back office systems as opposed to EDI or GUI access.
	49:1-17	Legal conclusion.	Foundation evidence for opinion that gateway access is superior to direct access to back office systems, which is proper testimony on rehearing. See Order Granting Rehearing of Issue No. IX.
	49:19-22	Within possession at the time of the hearing.	See above.



NAME	SECTION TO STRIKE	REASON GIVEN BY CLECS	RESPONSE OF AMERITECH ILLINOIS
	50:5	Legal conclusion.	Direct response to Commissioner Squires' Question No. 15, requesting a recitation of what information is needed via direct access and why. Foundation evidence for opinion that there is no OSS-related information that CLECs can obtain via direct access that they are not already receiving via Ameritech Illinois' gateways. Opinion and factual conclusion based on facts set forth in the testimony.
	51:1-52:2	Duplicative Below (Jacobson Rebuttal at 8-9); Within possession at the time of the hearing.	Direct response to Commissioner Squires' Question No. 15, requesting a description of the similarities and differences between providing direct access to back office systems as opposed to EDI or GUI access, and requesting a recitation of what information is needed via direct access and why.
Ransom	1:14-23	Within possession at time of hearing.	Foundation evidence for opinions and responses to Commissioner Squires' Question Nos. 6, 7 and 8, and for discussion related to propriety of the Project Pronto requirement, per the grant of rehearing on Issues II, III, and VI.
	2:3-5 2:6-26	Within possession at time of hearing.	Direct response to Commissioner Squires' Question No. 7, requesting information about line card compatibility and whether there are any established industry standards governing line card interchangeability. Repeats evidence proposed in affidavit in support of rehearing.
	2:6-26; Schedule NR-1; NR-2	Within possession at time of hearing; Legal conclusion.	Direct response to Commissioner Squires' Question No. 7, requesting information about line card compatibility. Relevant to grant of rehearing on Issues III (line card collocation) and VI (practicality/infeasibility). Repeats evidence proposed in affidavit in support of rehearing.

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	3:21-25; 4-5	Duplicative below (Lube Rebuttal 17-25); Within possession at time of hearing.	Direct response to Commissioner Squires' Question Nos. 6 and 8. Foundation evidence for the opinion that line card "collocation" and the creation of Project Pronto "UNEs" is improper, which is proper testimony on rehearing. <i>See</i> Order Granting Rehearing of Issue III and VI of Ameritech Illinois' Application for Rehearing. Repeats evidence proposed in affidavit in support of rehearing.
	6:18-25	Legal conclusion.	Direct response to Commissioner Squires' Question No. 6. Relevant to grant of rehearing on Issues III and VI.
	6:27-28; 7:1-12	Duplicative below (Lube Rebuttal 17-21); Within possession at time of hearing.	See above.
	10:19-26	Duplicative below (Lube Rebuttal 23); Within possession at time of hearing.	Direct response to Commissioner Squires' Question No. 8. Relevant to grant of rehearing on Issues III and VI.
Waken	2: 12-15	Duplicative below (Jacobson Hearing Tr. 862-866); Within possession at time of hearing.	Direct response to Commissioner Squires' Question No. 15, requesting a description of the similarities and differences between providing direct access to back office systems as opposed to EDI or GUI access, and requesting a recitation of what information is needed via direct access and why.
	2: 17-21	Duplicative below (Jacobson at 15); Within possession at time of hearing.	Direct response to Commissioner Squires' Question No. 15, requesting a description of the similarities and differences between providing direct access to back office systems as opposed to EDI or GUI access, and requesting a recitation of what information is needed via direct access and why. Relevant to grant of rehearing on Issue IX.

NAME	SECTION TO STRIKE	REASON GIVEN BY CLECS	RESPONSE OF AMERITECH ILLINOIS
	2: 21- 3: 7	Scope; Within possession at time of hearing.	Direct response to Commissioner Squires' Question No. 9. Foundation evidence for opinion concerning the costs associated with enhancing back office systems to accommodate CLEC "collocation" of plug in cards, which is proper testimony on rehearing given the grant of rehearing on Issue IX.
	3: 8- 4: 12	Duplicative below (Jacobson Hearing Tr. 862-866).	Direct response to Commissioner Squires' Question No. 15, requesting a description of the similarities and differences between providing direct access to back office systems as opposed to EDI or GUI access. Relevant to grant of rehearing on Issue IX.
	4: 18- 5: 12	Scope; Within possession at time of hearing; Unsupported speculation.	See above.
	6: 4-12	Scope; Within possession at time of hearing.	See above.
	8: 11-18	Duplicative below (Jacobson Rebuttal at 14); Scope; Within possession at time of hearing.	Foundation evidence for opinion that accommodating direct access to back office systems would be costly, inefficient and unwise, which is proper testimony on rehearing. See Order Granting Rehearing of Issue No. IX. ("The Commission's Decision allowing CLECs Direct Access to Ameritech Illinois' Back Office Systems Has No Factual or Legal Basis") of Ameritech Illinois' Application for Rehearing.
	9: 21- 11: 13	Duplicative below; Within possession at time of hearing; Scope.	Direct response to Commissioner Squires' Question No. 15, requesting a list of "all systems/interfaces included within Ameritech Illinois' OSS system," and the information available through those systems, denoting the information that is proprietary in nature. Relevant to grant of rehearing on Issue IX.

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	Attachment B	Duplicative below (Jacobson Rebuttal at 10); Within possession at time of hearing.	Direct response to Commission Squires' Question No. 15. Relevant to grant of rehearing on Issue IX.
	11: 15- 12: 4	Duplicative below (Jacobson Rebuttal at 11).	Direct response to Commissioner Squires' Question No. 15, requesting a list of "all systems/interfaces included within Ameritech Illinois' OSS system," and the information available through those systems, denoting the information that is proprietary in nature. Relevant to grant of rehearing on Issue IX.
	12: 22- 13: 11	Duplicative below (Jacobson Rebuttal at 11); Within possession at time of hearing.	See above.
	13: 19- 14: 4	Duplicative below (Jacobson Rebuttal at 13); Within possession at time of hearing.	See above.
	14: 6-17	Duplicative below (Jacobson Rebuttal at 13); Within possession at time of hearing; Scope.	Foundation evidence for opinion that accommodating direct access to back office systems would be costly, inefficient and unwise, which is proper testimony on rehearing. <i>See</i> Order Granting Rehearing of Issue No. IX ("The Commission's Decision allowing CLECs Direct Access to Ameritech Illinois' Back Office Systems Has No Factual or Legal Basis") of Ameritech Illinois' Application for Rehearing.
	15: 6-14	Duplicative below; Within possession at time of hearing.	Direct response to Commissioner Squires' Question No. 15, requesting a description of the similarities and differences between providing direct access to back office systems as opposed to EDI or GUI access. Relevant to grant of rehearing on Issue IX.
	15: 16-23	Duplicative below; Legal conclusion; Within possession at time of hearing.	See above.

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	16: 2-9	Within possession at time of hearing; Duplicative below.	See above.
	16: 17-23	Within possession at time of hearing.	See above.
	19: 2-23	Duplicative below; Within possession at time of hearing.	See above.
	20: 13-16	Within possession at time of hearing; Relevance.	See above.
	20: 17- 21: 7	Duplicative below; Within possession at time of hearing.	See above.
	21: 9- 21: 14	Relevance; Scope; Within possession at time of hearing.	See above.
	22: 2- 24: 14	Duplicative below; Within possession at time of hearing.	Foundation evidence for opinion that accommodating direct access to back office systems would be costly, inefficient and unwise, which is proper testimony on rehearing. <i>See</i> Order Granting Rehearing of Issue No. IX ("The Commission's Decision allowing CLECs Direct Access To Ameritech Illinois' Back Office Systems Has No Factual or Legal Basis") of Ameritech Illinois' Application for Rehearing.
	24: 16- 26: 16	Duplicative below; Within possession at time of hearing; Legal conclusion.	See above.
	26: 17- 27: 13	Within possession at time of hearing; Scope; Relevance.	See above.
	27: 4-8	Within possession at time of hearing; Scope.	See above.

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	27: 15- 28: 20	Relevance; Scope; Within possession at time of hearing.	Foundation evidence for opinion that accommodating direct access to back office systems would be costly, inefficient and unwise, which is proper testimony on rehearing. See Order Granting Rehearing of Issue No. IX ("The Commission's Decision allowing CLECs Direct Access To Ameritech Illinois' Back Office Systems Has No Factual or Legal Basis") of Ameritech Illinois' Application for Rehearing.
	28: 12-20	Duplicative below; Relevance; Scope; Within possession at time of hearing.	See above.
	29: 1- 33: 14	Scope; Duplicative below; Within possession at time of hearing.	Direct response to Commissioner Squires' Question No. 9. Foundation evidence for opinion concerning the costs associated with enhancing back office systems to accommodate CLEC "collocation" of plug in cards. This is proper testimony on rehearing. See Order Granting Rehearing of Issue No. VI ("The Order's Project Pronto Requirement Is Technically Unsound, Inefficient, and Largely Infeasible") of Ameritech Illinois' Application for Rehearing, as well as Mr. Keown's affidavit in support of rehearing.
	31: 16-19	Scope; Relevance.	See above.
	33: 16- 35: 14	Within possession at time of hearing; Scope.	Opinions and conclusions based on testimony properly set forth in response to Commissioner Squires' Questions and in discussion of matters raised by the grant of rehearing on Issue IX.
	35: 1-3	Unsupported Speculation.	See above.

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Welch	Attachment A; B; C; D	Duplicative below; Within possession at time of hearing; Scope.	Direct response to Commissioner Squires' Question No. 8 regarding inefficient or infeasible points of interconnection. Also relevant to grant of rehearing on Issue VI (practicality/feasibility issues).
	Attachment E	Unsupported speculation.	Direct response to Commissioner Squires' Question No. 8 regarding inefficient or infeasible points of interconnection. Also relevant to grant of rehearing on Issue VI (practicality/feasibility issues).
		Scope; Within possession at time of hearing; Unsupported Speculation.	[No reference made to testimony]
	5:1-19	Scope; Within possession at time of hearing.	Foundation evidence for Ameritech Illinois' proposed manual loop qualification charge, which is proper testimony on rehearing. <i>See</i> Order Granting Rehearing of Issue No. XIII ("The Commission's \$0 Recurring OSS Modification Charge is Unlawful") of Ameritech Illinois' Application for Rehearing.
	2:5; 2:12-37; 3; 4:1-30	Within possession at time of hearing.	See above.
	4:36-42; 4:1-19	Within possession at time of hearing.	See above.
	6:5-31; 7-10; 11:1-7	Duplicative below (Lube Rebuttal 8-9, 14, 23); Within possession at time of hearing.	Direct response to Commissioner Squires' Question No. 8, and thus also relevant to the grant of rehearing on Issue VI.